

edwardguerreroind

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FILED
DISTRICT COURT OF GUAM
FEB 28 2007 ✖
MARY L.M. MORAN
CLERK OF COURT

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EDWARD M.C. GUERRERO,

Defendant.

CRIMINAL CASE NO. **07-00022**

INDICTMENT

FRAUDULENT USE OF A CREDIT CARD

[15 U.S.C § 1644] (Count I)

ACCESSING DEVICE FRAUD

[18 U.S.C. §1029] (Count II)

THE GRAND JURY CHARGES:

COUNT I - FRAUDULENT USE OF A CREDIT CARD

On or about December 2006, the exact date being unknown, in the District of Guam, the defendant, EDWARD M.C. GUERRERO, willfully and knowingly, in a transaction affecting interstate or foreign commerce, in that the stolen or fraudulently obtained Citibank credit card is serviced by a Citibank call center located in Manila, Philippines and Citibank is a multinational corporation with banking entities throughout the United States and the world, did use a lost, stolen or fraudulently obtained Citibank credit card to obtain goods, services and things of value within a one-year period, said goods, services and things of value having an aggregating value in excess of \$1,000.00, in violation of Title 15, United States Code, Section 1644.

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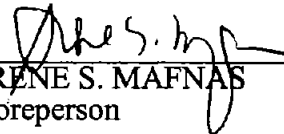
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COUNT II - ACCESSING DEVICE FRAUD

On or about December 2006, in the District of Guam, the defendant, EDWARD M.C. GUERRERO, knowingly and with intent to defraud used one unauthorized access device(s) as defined in subsections (e)(1) and (3) e.g. a Citibank credit card No. XXXX060249352101, and by such conduct, from on or about December 20, 2006 and ending on or about December 31, 2006, obtained items of values aggregating to an amount of \$1,543.00, said use affecting interstate or foreign commerce, in that the stolen or fraudulently obtained credit card is serviced by a Citibank call centered located in Manila, Philippines and Citibank is a multinational corporation with banking entities throughout the United States and the world, in violation of 18 U.S.C. 1029(a)(2).

DATED this 28th day of February 2007.

A TRUE BILL.



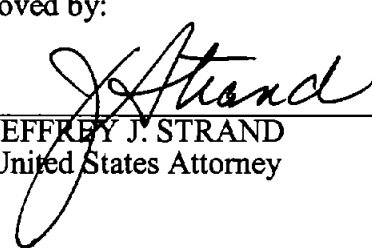
IRENE S. MAFNAS
Foreperson

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: 

KRISTIN D. ST. PETER
Special Assistant U.S. Attorney

Approved by:

By: 

JEFFREY J. STRAND
United States Attorney